

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2014 MAR 27 P 4: 23

PAUL JONES

Plaintiff

Civil Action No. **1:14-cv-10218-GAO**

V.

Experian Information Solutions, Inc. et al  
Defendants

**MOTION FOR ENTRY OF DEFAULT JUDGMENT**

TO THE HONORABLE JUDGE OF THIS COURT:

The Plaintiff, Paul Jones, comes before the court with this motion for Entry of Default Judgment against Experian Information Solutions, Inc, Professional Debt Mediations Inc., Andreu, Palma & Andreu, PL, The Law Office of Pollack & Rosen and Dynamic Recovery Service, Inc.

and states as follows:

1. Plaintiff has made all filings required of this court to bring a cause of action against the defendants for damages under the FDCPA 15U.S.C. §1692, TCPA 47 U.S.C §227 ,MDCRA 940 CMR 7.00. and or Fair Credit Reporting Act.
2. Plaintiff has made proper service of the summons and complaint to the defendants, as evidenced by the United State Postal Service Certified Mailing Receipt proof of mailing and receipt of the summons and complaint.

3. The time for the defendant to respond is past and there has been no response to the service of summons and complaint in this matter and defendant is therefore in default.
4. Plaintiff respectfully moves the court to enter an order of default judgment against the defendant Professional Debt Mediations Inc, in the amount of \$3900.00.
5. Plaintiff respectfully moves the court to enter an order of default judgment against the defendant Experian Information Solutions, Inc, in the amount of \$24,000.
6. Plaintiff respectfully moves the court to enter an order of default judgment against the defendant Andreu, Palma & Andreu, PL, in the amount of \$18,900.
7. Plaintiff respectfully moves the court to enter an order of default judgment against the defendant The Law Office of Pollack & Rosen in the amount of \$5900.
8. Plaintiff respectfully moves the court to enter an order of default judgment against the defendant Dynamic Recovery Service, Inc. in the amount of \$5900.
9. Plaintiff has made a request for clerk's default judgment on March 25, 2014.

**Wherefore,** the Plaintiff respectfully moves the court to enter an order of default judgment against the all the defendant above for statutory damages as well as the cost of bringing this action as stated above and the annexed bill of cost and for which let execution issue.

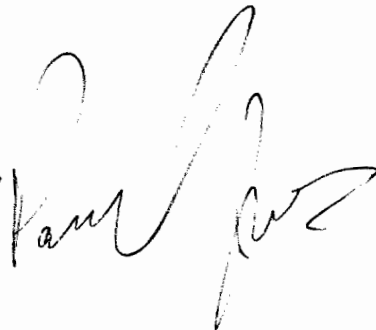
Respectfully Submitted,

Paul Jones

572 Park Street

Stoughton, Ma 02072

[Pj22765@gmail.com](mailto:Pj22765@gmail.com)

A handwritten signature in black ink, appearing to read 'Paul Jones', is written over the typed name and address.

888-655-3004

**Andreu, Palma & Andreu, PL**

1000 NW 57<sup>th</sup> Court, Ste 400

Miami Florida.

Phone: 1-877-631-0174

**The Law Office of Pollack & Rosen**

806 S Douglas Rd #200

Coral Gables, FL 33134

**Dynamic Recovery Service, Inc.**

4101 McEwen Road, Suite 150

Farmers Branch, Texas 75244.

**Professional Debt Mediation, Inc.**

7948 Baymeadows Way 2<sup>nd</sup> Floor

Jacksonville, Florida 32256.

**Experian Information Solutions, Inc**

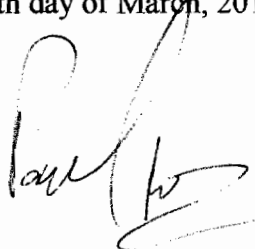
P.O Box 9701

Allen Texas 75013

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been mailed to the defendants on this 26th day of March, 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul H. Rosen", is written over a horizontal line.

March 26, 2014

Paul Jones

572 Park Street

Stoughton, Ma 02072

[Pj22765@gmail.com](mailto:Pj22765@gmail.com)

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**STATEMENT OF COST INCURRED BY PLAINTIFF**

**Clerks Fee for filing Complaint \$400**

**Cost of service of summons and complaint**

Respectfully Submitted,

**Paul Jones**

**572 Park Street**

**Stoughton, Ma 02072**

**Pj22765@gmail.com**

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